

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

MICHAEL CHAVEZ, individually and on behalf  
of all others similarly situated,,

Plaintiff,

v.

CHARLES BARATTA LLC, *et al.*

Defendants.

Civil Action No. 2:21-cv-06771-JMA-JMW

**JOINT STATUS REPORT**

Plaintiff, Michael Chavez and Defendants, Charles Baratta LLC (“Defendant Baratta”) and Defendant Sanders Phillips and Grossman, LLC (“Defendant Sanders”) (collectively “Defendants”) submit this Joint Status Update in advance of the upcoming Initial Conference and various impending discovery deadlines in the above-captioned matter. On May 5, 2022, the Parties participated in a private mediation that resulted in a settlement in principle that resolves this matter on an individual basis with respect to Plaintiff Chavez’s claims. In light of the settlement, the Parties anticipate finalizing the terms of the settlement and filing a Notice of Voluntary Dismissal within the next thirty (30) days.

Pursuant to the Court’s March 22, 2022, Order, an Initial Conference is currently set to go forward on May 11, 2022. In light of the above, the Parties request that the Court indefinitely adjourn the Initial Conference pending dismissal of this case.

Dated: May 10, 2022

/s/ Laura E. Kogan

Laura E. Kogan (0087453) (*pro hac vice*)  
John N. Dagon (0098128) (*pro hac vice*)  
BENESCH, FRIEDLANDER, COPLAN &  
ARONOFF LLP  
200 Public Square, Suite 2300  
Cleveland, Ohio 44114-2378  
Telephone: 216.363.4500  
Facsimile: 216.363.4588  
Email: lkogan@beneschlaw.com  
jdagon@beneschlaw.com

Edward C. Wipper  
BENESCH, FRIEDLANDER, COPLAN &  
ARONOFF LLP  
17 State Street, Suite 4000  
New York, New York 10004  
Telephone: (646) 593-7051  
Facsimile: (646) 798-8902  
Email: ewipper@beneschlaw.com  
*Attorneys for Defendants Charles Baratta LLC and  
Sanders Phillips Grossman LLC*

Dated: May 10, 2022

/s/ Anthony I. Paronich

Anthony I. Paronich  
PARONICH LAW, P.C.  
350 Lincoln St., Suite 2400  
Hingham, MA 02043  
Telephone: (617) 485-0018  
Email: anthony@paronichlaw.com

-and-

Avi R. Kaufman  
KAUFMAN PA  
400 Northwest 26<sup>th</sup> Street  
Miami, Florida 33127  
Telephone: (305) 469-5881  
Email: kaufman@kaufmanpa.com  
*Attorneys for Plaintiff*